

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**LARON MCCLOUD,
on behalf of himself and all others
similarly situated,
Plaintiff,**

V.

Civil Action No.: 5:14-cv-620

**MCCLINTON ENERGY GROUP, L.L.C.
and JAYCAR ENERGY GROUP, L.L.C.
d/b/a JAYCAR FRAC PLUGS,
Defendants.**

DECLARATION OF STEPHANIE ARANDA

Declarant, Stephanie Aranda, pursuant to 28 U.S.C. § 1746 and under penalty of perjury hereby provides the following Declaration:

1. My name is Stephanie Aranda. I am over twenty-one (21) years of age and competent to give this Declaration. I have never been convicted of a felony, and I am not otherwise disqualified from giving testimony before a United States District Court. I am personally acquainted with the facts and records discussed in this Declaration. The statements contained within this Declaration are true and correct.

2. I am currently employed as the Director of Human Resources for Surf-Frac Wellhead Equipment Company, Inc. ("SWECO"). I have served in that position since November 30, 2009. My business address is Surf-Frac Wellhead Equipment Company, Inc., 12620 State Hwy. 191, Midland, Texas 79707.

3. SWECO, a subsidiary of McClinton Energy Group, LLC (“MEG”) is an oil and gas services company, based in Midland, Texas, that provides various equipment and services relating to rig valves and frac plugs to the oil and natural gas drilling industry at various locations across the United States. Jaycar Energy Group, LLC d/b/a Jaycar Frac Plugs (“Jaycar”)

is also a subsidiary of MEG. As the Director of Human Resources for SWECO, I monitor and serve the Human Resource functions of Jaycar. In my role, I have personal knowledge of (a) Jaycar's employment policies and practices; (b) Jaycar's payroll practices and pay rates; (c) Jaycar's employee training and employee work schedules; (d) Jaycar's equipment storage and distribution facilities; and (e) and Jaycar's employee supervision and salary procedures.

4. In my role servicing Jaycar's Human Resource functions, I am aware that Plaintiff Laron McCloud ("Plaintiff") and Robert Rios ("Rios") accepted their jobs as Plug Technicians and received job training in Midland/Odessa, Texas. Both Plaintiff and Rios worked out of the Midland/Odessa, Texas location.

5. I am also aware that employees in Midland/Odessa, Texas created McCloud's and Rios' work schedule and that they acquired the necessary equipment to perform their jobs from Defendants' facilities located in Midland/Odessa, Texas. McCloud and Rios regularly interacted with other employees and customers in Midland/Odessa, Texas and these individuals will have knowledge of Plaintiff's work schedule and hours worked.

6. Furthermore, I have knowledge that, as Plug Technicians, McCloud and Rios reported their work progress to their supervisors in Midland/Odessa, Texas each day and that Jaycar's administrative offices in Midland/Odessa, Texas process and pay Plaintiff's wages. The payroll records, work schedules, job tickets, personnel files, and other records are all maintained in Midland/Odessa, Texas. Plaintiff and Rios reported their work progress to their supervisors in Midland/Odessa, Texas each day, and they received their paychecks from Defendants' administrative offices located in Midland/Odessa, Texas.

7. Plaintiff performed work duties at the Midland/Odessa, Texas location. Plaintiff was also dispatched to various locations. Whenever a Plug Technician is dispatched to a

worksite, a job ticket is created which indicates the client and the county in which the work is being performed. I have reviewed Plaintiff's job tickets and Plaintiff was dispatched to perform services in the following counties in Texas: Midland, Upton, Glasscock, Howard, Culberson, Andrews, Martin, Ector, Reagan, Ward, Crane, Irion, Dawson, Scurry, and Loving.

8. Similarly, Rios performed work duties at the Midland/Odessa, Texas location. Rios was dispatched to perform work in the following counties in Texas: Midland, Culberson, Upton, Martin, Reagan, Glasscock, Dawson, Ector, Crockett, Howard, Scurry, and Loving.

9. Neither Plaintiff nor Rios have any job tickets indicating they were dispatched to the following counties in Texas: Atascosa, Bandera, Bexar, Comal, Dimmit, Frio, Gonzales, Guadalupe, Karnes, Kendall, Kerr, Medina, Real, or Wilson.

10. I have reviewed Plaintiff's personnel file and Plaintiff maintains a residence in Brownwood, Texas and lives in Midland, Texas during the week while working at Jaycar.

11. I have reviewed Rios's personnel file, and Rios lives in Midland, Texas.

12. Finally, Plaintiff, in May 2014, accepted a promotion to become the Shop Foreman, and since that time, he has worked on a daily basis at Jaycar's service and manufacturing facility in Midland, Texas.

I declare and verify under penalty of perjury that the foregoing is true and correct.

Executed on this 5th day of September, 2014.



Stephanie Aranda